

REMARKS

Claims 1,3-9 and 11-20 are pending in the present application. The Office Action and cited references have been considered. Favorable reconsideration is respectfully requested.

Claims 1-20 were rejected under 35 U.S.C. § 103 as being unpatentable over Tarpey (European Patent Application 0701202), and further in view of Main et al. (U.S. Patent No. 6,674,724). This rejection is respectfully traversed for the following reasons.

Claim 1 has been amended to include the recitations of claims 10, including the intervening recitations of claim 2, along with additional limitations as will be discussed below. Particularly, claim 1 now recites, *inter alia*, the steps of providing, parsing, building and creating, as recited in the previous claim 1, in addition to the following claimed combination: for at least a sub-plurality of the components, providing respective non-typical component interfaces so that step (a) (the step of providing) includes the steps of: (i) providing a command description of each command supported by any of the sub-plurality of the components, including commands not supported by most of the components; and (ii) providing a relationship between each said command and each of said subplurality of the components for integrating the non-typical

components in the interface software program, the step of providing a relationship comprises the steps of: (a) determining at least one operation for performing with each of the plurality of components; and (b) determining a relationship between the at least one operation and each of the plurality of commands. This is not taught, disclosed or made obvious by the prior art of record.

In the response to arguments on page 7 of the Office Action, the examiner noted that the features upon which Applicant relied in its discussion of claim 10 (i.e., "for each operation allowed with any component of the system," and "non-corresponding command") are not recited in the rejected claim. Applicant has thus amended claim 1 to specifically recite these features. In the rejection of claim 10, on page 4 of the Office Action, the examiner cites Tarpey as allegedly teaching the features claimed therein and cites page 2, lines 21 et seq. If this rejection is maintained, the examiner is requested to provide a more specific indication of where the claimed features can be found in the Tarpey reference. The examiner's current citation encompasses almost the entire patent and so does not serve to notify Applicant of the examiner's position in this regard. Nonetheless, Applicant respectfully submits that Tarpey does not disclose the combination currently claimed in claim 1. According the

applicant's description, on page 8 of the specification,
states:

the method of the present invention enables a command interface for a network element to be automatically constructed for a modular command description, such that interlinking command interfaces can be created from a plurality of command descriptions. Since each command description is modular, interfaces for new commands can be easily added and integrated into an existing system of interfaces for interacting with a network element. The method of the present invention enables a set of interfaces to be more easily constructed and updated for a complex system such as T::DAX® digital cross-connect. Furthermore, these interfaces present commands grouped in a logical manner, such that each interface only shows the user commands which are available at each stage of the interaction, thereby simplifying the complexity of management of these commands. Thus, the method of the present invention enables a set of interfaces to be automatically created and updated, which both simplifies the task of programming these interfaces and of operating these interfaces once they have been created.

In particular, the claimed invention describes a method of automatically generating an interface software program for displaying the command interface for each command to a user, i.e., automatic generation of a GUI program. The method enables a set of interfaces to be automatically created as a GUI system for operating a complex system for a telecommunications network, comprising a plurality of components, such as a digital cross-connect. According to claim 1, the complex system features a plurality of components, each supporting a sub-plurality of the commands

and for at least a sub-plurality of the components, non-typical component interfaces are provided, respectively, by providing a command description of each command supported by any of the sub-plurality of components, including commands not supported by most of the components, and providing a relationship between each command and each of the sub-plurality of components for integrating the non-typical component interfaces in the interface software program. The step of providing a relationship between each command and each of the sub-plurality of components includes the steps of determining at least one operation for performing each of the plurality of components and determining a relationship between the at least one operation in each of the plurality of commands.

As noted previously, Tarpey describes a graphical front end (GUI) that can be added to UNIX command or shell script, to handle parameter input (see Tarpey's claim 1 and lines 36-39 of page 2). It is used for activation of UNIX commands which are "user non-friendly." Tarpey does not mention a plurality of components for which the mentioned actions are performed. Thus, no relationship is defined described between commands and components, parameters and components, etc., in Tarpey.

The Office Action correctly notes that Tarpey does not disclose a telecommunications network. The Office Action cites Main as allegedly teaching telecommunications network equipment which can be used with the teachings of Tarpey to yield Applicant's claimed invention. The Office Action asserts that "one would have been motivated to make such a combination because the dynamically generated control or setup configuration for ever-changing networking elements would have been obtained as taught by Main." Applicant respectfully disagrees.

First, it is noted that Main does not disclose the deficiencies noted above with respect to the Tarpey patent and claim 1. Further, Applicant respectfully submits that the combination asserted by the Office would not have been obvious to one of ordinary skill in the art at the time Applicant's invention was made, absent impermissible hindsight reference to Applicant's disclosure. The Main patent is directed to a system which provides a web-based integrated test system that enables all network circuits and elements to be tested with a common user interface. Main does not disclose, suggest or teach dynamically generated control or setup configurations. If this rejection is maintained, the Office is requested to specifically point

out, by more specific citation to the teachings in the patent relied upon.

For at least these reasons Applicant respectfully submits that claim 1 is patentable over the prior art of record whether taken alone or in combination as proposed in the Office Action.

Claim 20 has been amended to place it in independent form. Applicant respectfully submits that the cited prior art does not teach or disclose the claimed combination as recited in claim 20. Applicant respectfully submits that Tarpey discloses, for a single component, the steps of providing a command description of each command supported by any component and providing a relationship between each command and component. However, Tarpey does not disclose a relationship between a command and each of a group of components ("each of the remaining sub-plurality of components"). Accordingly, for at least this reason, and for the reasons discussed above with respect to claim 1, Applicant respectfully submits that claim 20 is patentable over the prior art of record.

Claims 3-9 and 11-19 are patentable over the prior art of record at least for the reasons discussed above with respect to claim 1 from which they depend.

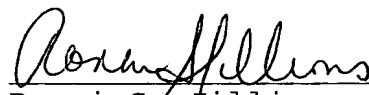
Appln. No. 09/889,627
Amd. dated June 13, 2005
Reply to Office Action of April 12, 2005

In view of the above amendments and remarks,
Applicant respectfully requests reconsideration and withdrawal
of the outstanding rejections of record. Applicant submits
that the application is in condition for allowance and early
notice to this effect is most earnestly solicited.

If the Examiner has any questions he is invited to
contact the undersigned at 202-628-5197.

Respectfully submitted,

BROWDY AND NEIMARK, P.L.L.C.
Attorneys for Applicant

By 
Ronni S. Jillions
Registration No. 31,979

RSJ:tbs
Telephone No.: (202) 628-5197
Facsimile No.: (202) 737-3528
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